## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS **TYLER DIVISION**

BLUE SPIKE, LLC

Plaintiff,

Civil Action No. 6:12-CV-499 MHS

**LEAD CASE** 

v.

TEXAS INSTRUMENTS, INC.

Defendant.

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BLUE SPIKE, LLC,

Plaintiff,

v.

ZEITERA, LLC, ENSEQUENCE, INC., AND RELATED CONTENT DATABASE, INC. d/b/a WATCHWITH,

Defendant.

Civil Action No. 6:12-CV-568-LED

JURY TRIAL DEMANDED

DECLARATION OF ZANE VELLA IN SUPPORT OF WATCHWITH INC.'S JOINDER TO DEFENDANT ZEITERA, LLC'S MOTION TO TRANSFER VENUE TO THE UNITED STATES DISTRICT COURT FOR THE NORTHERN **DISTRICT OF CALIFORNIA UNDER 28 U.S.C. § 1404(a)** 

- I, Zane Vella, declare under penalty of perjury that the following is true and correct:
- 1. I am the CEO of Watchwith Inc. ("Watchwith") I have personal knowledge of the facts set forth in this declaration, or access to Watchwith's corporate information and records allowing me to confirm these facts. If called as a witness, I could testify competently to these facts under oath.
  - 2. Watchwith is headquartered in San Francisco, California.
  - 3. Watchwith has no operations, employees, or property in Texas.
- 4. It is my understanding that Watchwith is accused in the complaint in the abovereferenced action based on alleged use of Zeitera's content recognition systems using fingerprint technologies accused in the complaint.
- 5. To the extent Watchwith has had any interaction with Zeitera, those interactions have taken place in California's Silicon Valley and the San Francisco Bay Area.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct based on my own personal knowledge.

Executed on February 5, 2014 in